



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

August 16, 2019

By ECF

The Honorable I. Leo Glasser
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

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Re: *James Greene, et al. v. Kabbalah Centre International, Incorporated, et al.*,
E.D.N.Y. Docket No. 19-cv-4304 (ILG)(SJB)

Dear Judge Glasser:

We represent Defendants Kabbalah Centre International, Incorporated; Kabbalah Centres of the United States, Incorporated; Kabbalah Centre of New York, Incorporated; The Kabbalah Centre of Florida, Inc.; Kabbalah Children's Academy; Kabbalah Enterprises, Incorporated; KAF Investments, LLC; 501 N. La Cienega, LLC; and Spirituality For Kids International, Inc. in the above-referenced matter. We write to request an extension of time for Defendants to answer, move, or otherwise respond to the Complaint from August 19, 2019 through August 23, 2019, to and including September 23, 2019.

In addition, pursuant to Your Honor's Individual Rules, the parties propose the following briefing schedule for the filing of any motion in lieu of an answer:

- September 23, 2019 – Deadline for Defendants to file a motion in lieu of an answer
- November 4, 2019 – Deadline for Plaintiffs to file their opposition or to amend their complaint
- November 25, 2019 – Deadline for Defendants to file their reply to Plaintiffs' opposition or to respond to any amended complaint

As reflected in the enclosed Stipulation, which was filed separately by ECF today, Plaintiffs consent to this request for an extension and to the proposed briefing schedule.

No previous request for an extension has been made.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ *Elise M. Bloom*

Elise M. Bloom

Proskauer»

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Enclosure

cc: All Counsel of Record (By ECF)
Jonathan P. Bach (By email)
John D. Cline (By email)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JAMES GREENE, JENNIFER SHAAL, OFER SHAAL, JAKE STONE, GUY SHOSHAN, EINAT EZRA MICHAELI, and YIFAT SHMILOVICH, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

KABBALAH CENTRE INTERNATIONAL, INCORPORATED; KABBALAH CENTRES OF THE UNITED STATES, INCORPORATED; KABBALAH CENTRE OF NEW YORK, INCORPORATED; THE KABBALAH CENTRE OF FLORIDA, INC.; KABBALAH CHILDREN'S ACADEMY; KABBALAH ENTERPRISES, INCORPORATED; KAF INVESTMENTS, LLC; 501 N. LA CIENEGA, LLC; SPIRITUALITY FOR KIDS INTERNATIONAL, INC.; and KAREN BERG, YEHUDA BERG, and MICHAEL BERG,

Defendants.

No. 19-cv-4304 (ILG)(SJB)

STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO THE COMPLAINT

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for the parties, that:

1. The time within which Defendants Kabbalah Centre International, Incorporated; Kabbalah Centres of the United States, Incorporated; Kabbalah Centre of New York, Incorporated; The Kabbalah Centre of Florida, Inc.; Kabbalah Children's Academy; Kabbalah Enterprises, Incorporated; KAF Investments, LLC; 501 N. La Cienega, LLC; Spirituality For Kids International, Inc.; and Karen Berg, Yehuda Berg, and Michael Berg (collectively, "Defendants") may move, answer, or otherwise respond to the Complaint is hereby extended from August 19, 2019 through August 23, 2019, to and including September 23, 2019;

2. In the event that any of Defendants files a motion in lieu of an answer, Plaintiffs James Greene, Jennifer Shaal, Ofer Shaal, Jake Stone, Guy Shoshan, Einat Ezra Michaeli, and Yifat Shmilovich (collectively, "Plaintiffs") will have to and including November 4, 2019 to file their opposition or to amend the Complaint pursuant to Fed. R. Civ. P. 15(a)(2); and
3. Defendants will have to and including November 25, 2019 to file their reply to Plaintiffs' opposition or to respond to any amended complaint.

There has been no previous request for an extension of time in connection with this matter.

Facsimile or electronic signatures on this Stipulation are hereby deemed originals. No provision of this Stipulation and Order shall be construed as a waiver of, and Defendants hereby expressly reserve, any and all defenses.

Dated: New York, New York
August 15, 2019

PIERCE BAINBRIDGE BECK PRICE &
HECHT LLP

/s/ Deborah H. Renner
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*Centre of New York, Incorporated;
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Kabbalah Enterprises, Incorporated;
KAF Investments, LLC; 501 N. La
Cienega, LLC; and Spirituality For
Kids International, Inc.*

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*Attorneys for Defendant Yehuda
Berg*

Dated: Brooklyn, New York
_____, 2019

SO ORDERED:

HON. I. LEO GLASSER
UNITED STATES SENIOR DISTRICT JUDGE